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United States Department of Transportation
Federal Aviation Administration

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Re: Docket Number FAA-203-14830 - 19
RIN 2120-AH02

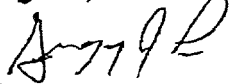
Sirs,

I am a Commercial Helicopter pilot who has flown on Maui since 1991 and I am well versed on SFAR 71 and it's effect on tour flights by helicopters. I have always felt that the rule was flawed from the beginning. SFAR 71 has greatly reduced the airspace that we fly in and taken important decision making options from the pilot that has had the effect of actually making our job less safe.

The altitude restrictions were put in place without concern for terrain, weather or general safety. The rule was implemented without comment from the local flying community, but was politically and emotionally driven at the time. The placing of aircraft, both fixed-wing and rotorcraft, in the same general airspace has placed an unacceptable burden on all pilots flying in Hawaii. Only by luck and great diligence by all pilots have many potential mid-air collisions been avoided. Eventually, luck will run out for some. At the least, the altitude restrictions for flights enroute should be adjusted to allow for lower flight, when necessary and/or when a certain altitude over a particular area is unnecessary or impractical. The one thousand foot altitude is unduly restrictive and mostly unsafe.

Before SFAR 71 is made into a permanent rule, the flying community in Hawaii must be heard and appropriate changes, which make sense, must be made to this onerous regulation. A search of accidents and incidents in Hawaii for the past nineteen years does not support the hypotheses that SFAR 71 has made any perceptible increases in safety here. Instead, the rule has placed a burden on the individual pilot to constantly put more and more concentration on abiding by the various little nuances of SFAR 71, thus taking away needed attention from other flight duties.

Regards,


Gregory J. Parr
Commercial Pilot
Maui, Hawaii